

Westvaco

April 11, 1989

Mr. Thomas C. Voltaggio
Acting Director
Hazardous Waste Management Division
United States Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

Re: Army Creek Landfill Site

Dear Mr. Voltaggio:

Your letter of March 27, 1989, addressed to me by certified mail, was not received until yesterday afternoon's mail. Since some of the dates mentioned in your letter have already passed, it is obvious that all of the dates are unreasonable as to Westvaco and the seven other companies now being named as PRPs.

Westvaco's contact person for these matters, Robert H. Dickinson, whose address is the same as mine, was in contact with the so-called original group of PRPs before the receipt of your letter. That group did not seem to be particularly interested in having other companies join. The "initiation fee" of \$10,000, before a company may attend meetings of the group, is unreasonable especially to a company like ours which has been provided with none of the details that the original PRP group presumably received under the special notice procedures of Section 122(e) of CERCLA. Companies with no liability or with de minimis liability should not have to pay a fee to the federal government or its surrogate in order to gain access to the allegations or facts. If EPA would like to share the appropriate details with us at this time, including a list of all PRPs and a waste-in list, we would be pleased to receive the same.

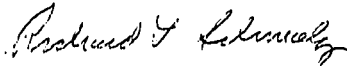
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Mr. Thomas C. Voltaggio
April 11, 1989
Page 2

Without more information from EPA or the original PRP group concerning the site and Westvaco's alleged connection to it, it is not possible for Westvaco at this time to comment further on the contents of your letter.

Very truly yours,



Richard L. Schmalz
Assistant General Counsel

RLS:mfo

cc: Robert H. Dickinson

AR200489